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October 20, 1998

VIA MESSENGER

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20054

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OCT 20 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

*Re: CC Docket No. 96-128  
Notice of Ex Parte Communication*


Dear Ms. Salas:

On Monday, October 19, representatives of the International Telecard Association ("ITA") met with Commissioner Harold Furchtgott-Roth and Legal Advisor Kevin Martin to discuss the above-mentioned proceeding. ITA requested that the Commission take final action on its Application for Review, filed April 8, 1998, regarding the Bureau's Memorandum Opinion and Order issued on delegated authority in this docket. In addition, ITA explained its position on payphone compensation issues that the Bureau is currently considering on remand, as reflected in its comments of record.

ITA was represented by Glenn B. Manishin, and the undersigned counsel, Stephanie Joyce. One copy of the attached document was distributed.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachments are being filed for inclusion in the record. Please contact me should you have any questions in regard to this matter.

Sincerely,

  
Stephanie A. Joyce

No. of Copies rec'd \_\_\_\_\_  
List A B C D E

# FCC "Dial-Around Compensation" Proceeding—July 13, 1998 Comments

<u>Commenter</u>	<u>Position</u>	<u>Commenter</u>	<u>Position</u>
AT&T	No payphone end user comp. Exists Either caller pays or 11 cents/call "default," otherwise FCC must develop cost-based rate	Airtouch Paging	Caller pays If not, special 800 codes needed
Cble & Wireless	Cost based rate (\$0.10 to \$0.15) and caller pays	CitiCorp	Exempt EBT (welfare) systems from charges
Consumer-Business Coalition	DAC not based on coin rate Payphone mkt. not competitive	Excel Communications	Market rate = caller pays OR Cost-based rate \$0.13 per call
Frontier	Cost-based rate (FCC analysis) Caller pays	ITA	Caller pays Cost-based rate = \$0.083 to \$0.15
IXC Communications	TELRIC methodology	LCI	Cost-based rate = \$0.10 to \$0.15 OR Caller pays
NYPSC	NYNEX costs < \$0.20 for coinless	PCIA	"Practical and legal" system needed Caller pays
PageNet	Cost-based rate ≤ \$0.15	Sprint	Caller pays Cost-based rate = \$0.101 to \$0.143
SkyTel	Revisit cost-based and caller pays	CompTel	Caller pays OR Cost-based rate = \$0.10 to \$0.15
Vocall and Galaxy (prepaid)	Cost-based rates (\$0.06 to \$0.11)	WorldCom	Caller pays mitigates ANI II unavailability and creates comp.
APCC	Coin rate, cost-adjusted SOS = new econ. Study	MCI	MCI cost study shows \$0.09 to \$0.12 per call cost
RBOC Payphone Coalition	Coin rates are competitive/market No locational monopolies exist Continue "avoided cost" approach New economic study attached		

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